

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

-v.-

ANTOINE WHITE,
a/k/a "Benji," and
MARILENNY SANTOS,
a/k/a "Smiley,"

Defendants.
-----x

INDICTMENT

07 Cr.

07 CRIM. 570

COUNT ONE

The Grand Jury charges:

1. From in or about August 2006, up to and including on or about June 7, 2007, in the Southern District of New York and elsewhere, ANTOINE WHITE, a/k/a "Benji," and MARILENNY SANTOS, a/k/a "Smily," the defendants, and others known and unknown, unlawfully, wilfully, and knowingly, did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Sections 2423(a) and 2423(d) of Title 18, United States Code.

2. It was a part and object of the conspiracy that ANTOINE WHITE, a/k/a "Benji," and MARILENNY SANTOS, a/k/a "Smily," the defendants, and others known and unknown, unlawfully, wilfully, and knowingly did transport individuals who had not attained the age of 18 years in interstate commerce, with the intent that the individuals engage in prostitution, and engage in other sexual activity for which a person could be charged with a criminal offense, in violation of Section 2423(a)

of Title 18, United States Code.

3. It was further a part and object of the conspiracy that ANTOINE WHITE, a/k/a "Benji," and MARILENNY SANTOS, a/k/a "Smily," the defendants, and others known and unknown, unlawfully, wilfully, knowingly, and for the purpose of private financial gain, did arrange, induce, procure and facilitate the travel of persons knowing that such persons would travel in interstate commerce for the purpose of engaging in illicit sexual conduct, in violation of Section 2423(d) of Title 18, United States Code.

Overt Acts

4. In furtherance of the conspiracy and to effect its illegal objects, ANTOINE WHITE, a/k/a "Benji," and MARILENNY SANTOS, a/k/a "Smily," the defendants, and others known and unknown, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. In or about January 2007, SANTOS traveled by bus with a 16 year old girl from New Jersey to New York, New York for the purpose of the girl prostituting herself in New York, New York.

b. In or about January 2007, SANTOS traveled by bus with a 17 year old girl from New Jersey to New York, New York for the purpose of the girl prostituting herself in New York, New York.

c. In or about January 2007, SANTOS showed a

minor how to prostitute herself in New York, New York.

d. In or about January 2007, WHITE paid for the transportation for a minor girl to travel from New Jersey to New York, New York for the purpose of engaging in prostitution.

(Title 18, United States Code, Section 2423(e).)

COUNT TWO

The Grand Jury further charges:

5. From in or about August 2006, up to and including on or about June 7, 2007, in the Southern District of New York and elsewhere, ANTONIE WHITE, a/k/a "Benji," and MARILENNY SANTOS, a/k/a "Smily," the defendants, unlawfully, willfully, and knowingly did transport individuals who had not attained the age of 18 years in interstate commerce, with intent that the individuals engage in prostitution and other sexual activity for which a person can be charged with a criminal offense, to wit, WHITE and SANTOS transported individuals under the age of 18 from New Jersey to New York, New York with intent that the individuals engage in prostitution and other sexual activity for which a person can be charged with a criminal offense.

(Title 18, United States Code, Sections 2423(a) and 2.)

COUNT THREE

The Grand Jury further charges:

6. From in or about August 2006, up to and including on or about June 7, 2007, in the Southern District of New York and elsewhere, ANTOINE WHITE, a/k/a "Benji," and MARILENNY SANTOS, a/k/a "Smily," the defendants, unlawfully, willfully, knowingly, and for the purpose of private financial gain, did arrange, induce, procure, and facilitate the travel of persons knowing that such persons would travel in interstate commerce for the purpose of engaging in illicit sexual conduct, to wit, WHITE and SANTOS facilitated the travel of minors from New Jersey to New York, New York, for the purpose of engaging in illicit sexual conduct.

(Title 18, United States Code, Sections 2423(d) and 2.)


COUNT FOUR

The Grand Jury further charges:

7. From in or about August 2006, up to and including on or about June 7, 2007, in the Southern District of New York and elsewhere, ANTOINE WHITE, a/k/a "Benji," the defendant, unlawfully, willfully, and knowingly persuaded, induced, and enticed an individual to travel in interstate commerce to engage in prostitution and other sexual activity for which a person can be charged with a criminal offense, and attempted to do so, to wit, WHITE knowingly persuaded, induced, and enticed an

individual to travel from New Jersey to New York, New York to engage in prostitution and other sexual activity for which a person can be charged with a criminal offense.

(Title 18, United States Code, Section 2422(a).)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

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Defendants.


INDICTMENT

07 Cr.

(18 U.S.C. §§ 2423(a), 2423(d),
2423(e), 2422(a) and 2)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL


Foreperson.

6/22/07 - Filed Indictment. Case assigned to
Judge Buchwald.
Eaton, J. U.S. M. J. #4